



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DEC 06 2019

DATE:

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Golden Refrigerant, Livonia, Michigan

FROM: Sarah Clark, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: Golden Refrigerant

Facility Location: 31800 Industrial Road, Livonia, Michigan, 48150

Date of Inspection: October 8, 2019

EPA Inspector(s):

1. Sarah Clark, Environmental Engineer
2. Linda Rosen, Environmental Engineer

Other Attendees

1. Carl Grolle, Owner/President, Golden Refrigerant
2. Glenn Jaewell, Transportation Manager, Golden Refrigerant
3. Mike Novak, President and CEO, American Truck and Fleet Repair
4. Michael Novak, Technician, American Truck and Fleet Repair

Contact Email Address: CGrolle@goldenrefrigerant.com

Purpose of Inspection: Clean Air Act (CAA) mobile source inspection

Facility Type: Refrigerant reclaimer

Regulations Central to Inspection: CAA 203(a)(3)(A) and (B)

Arrival Time: 8:50 AM

Departure Time: 11:40 AM

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Grolle unless otherwise noted. Glenn Jaewell, Mike Novak, and Michael Novak were only present for the truck inspection.

Process Description:

Golden Refrigerant operates several refrigerant recovery operations including a cylinder exchange program and a "milk run" to collect refrigerant from wholesalers, contractors, and individuals. Golden Refrigerant has a fleet of two straight trucks, used primarily for the "milk run," including a 16-foot truck and a 24-foot truck. In 2018, Golden Refrigerant purchased a used model year (MY) 2013 International 24-foot truck through Enterprise to replace their aging 24-foot truck.

Staff Interview:

Immediately after purchasing the MY 2013 International truck from Enterprise, Mr. Grolle took the truck to American Truck and Fleet (ATF) for inspection. ATF found soot deposits all over the engine which required cleaning. Mr. Grolle stated that Enterprise offered to pay for the engine cleaning. Later, around November or December of 2018, Mr. Grolle observed that the truck would not start. He brought the truck to ATF for diagnosis. According to Mr. Grolle, ATF eventually determined that the issue was a wiring problem because the wiring harness did not match Original Engine Manufacturer (OEM) specifications. Mr. Grolle also believed, based on what ATF had told him, that the Engine Control Module (ECM) had been modified. ATF purchased the OEM software to help with their diagnosis and received a quote from International to replace the wiring harness; however, at the time of the inspection, the wiring harness had not been replaced. Mr. Grolle said that he tried to return the truck to Enterprise, but he said that Enterprise would not accept the truck because the warranty had expired. Mr. Grolle called EPA to report a potentially tampered vehicle.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

After touring the reclamation process, Mr. Grolle escorted EPA to the back lot where EPA inspected the MY 2013 International truck, with vehicle identification number (VIN)

3HAMMAALXEL791549 ("Truck 1"). According to the ATF staff, the International OEM software allows users to see the repair history of a vehicle by searching its VIN. ATF was able to see that this particular truck had experienced numerous breakdowns all over the country. Although ATF could see the basics of each visit, they could not access the detailed descriptions of each visit. They believed that the details had been deleted and said that anyone with a log-in could delete the details.

Photos and/or Videos: were taken during the inspection.

Field Measurements: were taken during this inspection.

- On-board diagnostics (OBD) scans and a vehicle inspection log were completed on one vehicle during the inspection and are maintained in the case file (Attachments 1 and 2).

CLOSING CONFERENCE

Requested documents:

- Maintenance records for Truck 1

SIGNATURES

Report Author: Sarah Clark Date: 12/3/19
Section Chief: [Signature] Date: 12/6/19

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APPENDICES AND ATTACHMENTS

1. Appendix A: Digital Image Log
2. Attachment 1: CD-R with photos and OBD II Scanner Results⁺
3. Attachment 2: Physical/OBD Inspection Worksheet⁺

⁺Enforcement Confidential

Facility Name: Golden Refrigerant
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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Sarah Clark	2. Date(s) of Inspection: October 8, 2019
3. Company/Facility Name: Golden Refrigerant	4. Street Address, City, State: 31800 Industrial Road, Livonia, Michigan
5. Number of Images: 48	6. Archival Record Location: CD-R Labeled as "Golden Refrigerant, 10-8-2019"

Image Number	File Name	Date and Time (EST)	Latitude and Longitude	Description of Image
1	PA080037.JPG	2019:10:08 10:16:14	42.380556, -83.359444	Truck 1, overall
2	PA080038.JPG	2019:10:08 10:16:22	42.38074, -83.359617	Truck 1, engine from driver's side
3	PA080039.JPG	2019:10:08 10:16:33	42.38074, -83.359617	Truck 1, engine from passenger's side
4	PA080040.JPG	2019:10:08 10:20:35	42.38074, -83.359617	Engine label
5	PA080041.JPG	2019:10:08 10:20:53	42.38074, -83.359617	Engine label
6	PA080042.JPG	2019:10:08 10:22:03	42.380742, -83.359618	Engine label
7	PA080043.JPG	2019:10:08 10:22:38	42.380742, -83.359618	Engine label
8	PA080044.JPG	2019:10:08 10:23:57	42.380742, -83.359617	Engine label
9	PA080045.JPG	2019:10:08 10:26:10	42.380743, -83.359617	Exhaust gas recirculation (EGR) valve
10	PA080046.JPG	2019:10:08 10:26:21	42.380743, -83.359613	EGR valve
11	PA080047.JPG	2019:10:08 10:27:07	42.380745, -83.359608	EGR cooler
12	PA080048.JPG	2019:10:08 10:27:57	42.380747, -83.359602	EGR cooler
13	PA080049.JPG	2019:10:08 10:29:06	42.380747, -83.359592	Turbo charger
14	PA080050.JPG	2019:10:08 10:29:15	42.380747, -83.359592	Turbo charger
15	PA080051.JPG	2019:10:08 10:30:17	42.38075, -83.359618	Exhaust

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16	PA080052.JPG	2019:10:08 10:30:33	42.380753, -83.359615	Diesel oxidation catalyst (DOC) sensors
17	PA080053.JPG	2019:10:08 10:30:47	42.380755, -83.359613	DOC
18	PA080054.JPG	2019:10:08 10:30:53	42.380755, -83.359613	DOC
19	PA080055.JPG	2019:10:08 10:31:27	42.380752, -83.359615	Sensor before diesel particulate filter (DPF)
20	PA080056.JPG	2019:10:08 10:31:32	42.380752, -83.359615	DPF
21	PA080057.JPG	2019:10:08 10:31:50	42.380752, -83.359612	DOC label
22	PA080058.JPG	2019:10:08 10:32:04	42.380752, -83.359612	DOC label
23	PA080059.JPG	2019:10:08 10:32:35	42.380755, -83.359607	DOC label
24	PA080060.JPG	2019:10:08 10:32:49	42.380755, -83.359607	DOC label
25	PA080061.JPG	2019:10:08 10:33:02	42.380755, -83.359608	DOC label
26	PA080062.JPG	2019:10:08 10:33:35	42.380752, -83.35961	DOC label
27	PA080063.JPG	2019:10:08 10:33:57	42.380752, -83.359612	DPF label
28	PA080064.JPG	2019:10:08 10:34:08	42.380752, -83.359612	Sensor after DPF
29	PA080065.JPG	2019:10:08 10:38:57	42.380738, -83.359593	Chassis label
30	PA080066.JPG	2019:10:08 10:39:01	42.380738, -83.359593	Chassis label
31	PA080067.JPG	2019:10:08 10:39:16	42.380738, -83.359593	Chassis label
32	PA080068.JPG	2019:10:08 10:40:30	42.380723, -83.359578	Chassis label
33	PA080069.JPG	2019:10:08 10:40:37	42.38071, -83.35958	Chassis label
34	PA080070.JPG	2019:10:08 10:42:21	42.380715, -83.359578	License plate
35	PA080071.JPG	2019:10:08 10:44:02	42.380715, -83.359578	License plate

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36	PA080072.JPG	2019:10:08 10:52:19	42.380723, -83.359577	Dash
37	PA080073.JPG	2019:10:08 10:52:24	42.380768, -83.35954	Dash
38	PA080074.JPG	2019:10:08 10:56:14	42.380762, -83.359685	OBD scanner screen
39	PA080075.JPG	2019:10:08 10:56:46	42.380763, -83.359675	OBD scanner screen
40	PA080076.JPG	2019:10:08 11:02:11	42.380833, -83.359444	OBD scanner screen
41	PA080077.JPG	2019:10:08 11:02:29	42.380833, -83.359444	OBD scanner screen
42	PA080078.JPG	2019:10:08 11:03:46	42.380833, -83.359722	OBD scanner screen
43	PA080079.JPG	2019:10:08 11:04:55	42.380833, -83.359722	OBD scanner screen
44	PA080080.JPG	2019:10:08 11:13:35	42.380833, -83.359444	Aftertreatment module
45	PA080081.JPG	2019:10:08 11:13:39	42.380833, -83.359444	Wiring harness
46	PA080082.JPG	2019:10:08 11:13:43	42.380908, -83.359583	Wiring harness
47	PA080083.JPG	2019:10:08 11:20:39	42.380907, -83.359602	ECM module
48	PA080084.JPG	2019:10:08 11:21:06	42.38088, -83.359238	ECM module